

ORIGINAL

United States District Court
for the Middle District of PennsylvaniaWM Branch
Plaintiff
vs.MR. Russian et. al.,
Defendantcivil action no. 1:00-1728
(Judge) ConnerFILED
HARRISBURG, PA
JUL 19 2004Brief in Support of
Motion to modify DiscoveryMARY E. D'ANDREA, CLERK
Deputy Clerk

if it Please's the COURT Here come's ignoble inmate
William Branch CF-3756 Praying this gracious Tribunal
will modify it's Discovery order issued June 29, 2004.

Reasons: The narrowness of the discovery order
Created a misunderstanding question #6 would have eliminated
The chance to misunderstand "How many Defendants have had
Grievance written against them and what were they about"
The Relevance of this question would show a Patteran and
Practice also the parole question are needed as stated in Complaint 42
§1983. Looking at the Response Ms Mosley did not answer any of
my Question, this is a badfaith Response Rule 37(B)(3) Evasive
OR incomplete Disclosure, answer, OR Response.

The award was not enough to drive your point home SIR
as I am Pro Se I am entitled to attorney Fee's as well The
\$10.00 you awarded me did not cover one mailing, this is why
Ms Mosley has no Reverencial Fear of your Tribunal, SIR
I Respectfully Pray you will modify your order Respectfully

Proof of Service

Ms Mosley 15th FL Strawberry Square Harrisburg Pa 17120

Unsworn Declaration

I affirm under Penalty of the law that the above is true

Date 7-14-04William Branch CF 3756
PO Box 256 Waymart Pa. 18472

July 13, 2004
Branch vs Russian C.A M.D. No. 1:00
- 1728

William Branch CF-3756
P.O. Box 256
Waymart Pa. 18472

RE. S.D.A.G. Ms Mosley esq

madame with Reguard to the Discovery you
Provided, I see you misunderstood the question and that
maybe you and I need to confer

1. what did they do when I informed them that a Staff member
was Violating a D.O.C. Policy and mistreating myself or
another inmate?
2. How many Grievances have been written on them
(There is a Grievance Tracking System in place, all
Grievances must be numbered) and what were
they about. This is needed to show a pattern and
Practice by staff
3. Question on Pay you provided nothing making you
comply compliance with judge ~~Conner~~ Conner's
ORDER Violated.
4. I will Be asking Judge Conner to include question #6
as I see because he did not, this created a misunderstanding
5. also there is a time ~~period~~ period of 1995 to Date
Respectfully if you have any questions Please contact
me

Proof of Service

MS Mosley 15FL Strawberry Sq Harrisburg Pa 17120

I affirm under Penalty of the law that the above is unsworn Declaration TRUE

Date 7-13-04

William Branch CF 3756